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By ECF

June 14, 2019

Hon. Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Honig, et al., Case No. 1:18-cv-08175-ER (S.D.N.Y.)

Dear Judge Ramos:

Earlier this evening, Mr. Ladd filed a letter requesting that the Court order the SEC to produce documents in response to Mr. Ladd's requests for production forthwith. Despite Mr. Ladd's repeated requests, including a request earlier this week that the SEC let us know by Thursday whether it would be making its production this week, the SEC had refused to provide a date by which it would produce documents. Unexpectedly, Mr. Ladd did receive a production letter and hard drive from the SEC after the close of business today. Counsel received this production after our staff had already been directed to file today's letter requesting that the Court order the SEC to produce its investigative file.

Accordingly, although the SEC still has not indicated to Mr. Ladd that its production in response to Mr. Ladd's first requests for production is complete, Mr. Ladd requests that the Court disregard the letter that was filed today while we evaluate the SEC's production.

Respectfully,

/s/ Randall R. Lee

Randall R. Lee

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